

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	CASE NO. 21-22650-GLT
	)	
ANDREW LANCOS, JR.	)	
CAROL ANN LANCOS	)	CHAPTER 13
	)	
DEBTORS	)	RELATED TO CLAIM NO. 6
	)	
	)	Document No.
LAKEVIEW LOAN SERVICING, LLC	)	
	)	Related to Document Filed 9/7/22
MOVANT	)	
	)	
VS.	)	
	)	
ANDREW LANCOS, JR. and	)	
CAROL ANN LANCOS,	)	
RONDA J. WINNECOUR, ESQ. TRUSTEE	)	
	)	
RESPONDENTS	)	

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE AND CHAPTER 13  
PLAN FEASIBILITY**

The undersigned hereby declares that the Plan dated a December 16, 2021 is adequately funded for the change in the mortgage payment to Lakeview Loan Servicing, LLC to the amount of \$733.03 effective with the October 1, 2022 payment without reducing the percentage to Unsecured Creditors or amounts to be paid to other Creditors in the plan.

Therefore, no amended Plan is necessary and/or objection to the notice is required.

September 9, 2022

/s/ Edgardo D. Santillan  
Edgardo D. Santillan, Esquire  
PA ID No. 60030  
SANTILLAN LAW, P.C.  
908 22<sup>ND</sup> St.  
Aliquippa, PA 15001  
724-770-1040  
[ed@santillanlaw.com](mailto:ed@santillanlaw.com)

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	)	
RESPONDENTS	)	

**CERTIFICATION OF SERVICE**

I, Edgardo D. Santillan, Esquire of SANTILLAN LAW, P.C., 908 22<sup>ND</sup> St., Aliquippa, PA 15001 certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 9th day of September **I SERVED A COPY OF THE DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE UPON THE FOLLOWING:**

Office of the U.S. Trustee Suite 970, Liberty Center 1001 Liberty Ave Pittsburgh, PA 15222	Ronda J. Winnecour Chapter 13 Trustee Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219
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Mario Hanyon, Esquire  
Counsel for Movant  
[pabkr@brockandscott.com](mailto:pabkr@brockandscott.com)

I certify under penalty of perjury that the foregoing is true and correct.

EXECUTED ON September 9, 2022

/s/ Edgardo D. Santillan  
Edgardo D. Santillan, Esquire  
PA ID No. 60030  
SANTILLAN LAW, P.C.  
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